## VIA EMAIL

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2 290 BROADWAY NEW YORK, NY 10007-1866

December 4, 2020

Mr. Jacob Schmidt Republic Services 1235 Westlakes Dr., Suite 310 Berwyn, Pennsylvania 19312 Jschmidt4@republicservices.com

RE: December 2, 2020 Memorandum on Monroe Township Landfill Leachate Sewer Discharge

Dear Mr. Schmidt:

As per the December 2, 2020, SCS Engineers memo, BFI will be prepared, pending EPA/NJDEP/Township approval, to resume leachate discharge as early as December 10<sup>th</sup>. According to the three-step draft plan presented in the memorandum, during week 1 of discharge, leachate would be reintroduced in the sewer system at prescribed and approved rates, not to exceed 45 gpm. BFI contractors will be on site and in the neighborhood during the initial reintroduction to check for odors along Lani and Michelle Streets – the area of previous odor detections.

Step 1 of BFI's draft plan indicates that BFI personnel will be deployed to monitor odors and also that reports of odors from residents will be used to adjust leachate flow rates. The objective of the plan is to eliminate vapor exposure pathway to residents. Residents are potential receptors and should not be a component of a plan for vapor/odor monitoring and reporting. Adequate monitoring/controls should be incorporated into the plan to ensure an exposure pathway to residents is not completed. Please revise the monitoring plan to provide adequate air monitoring during Step 1, introduction of leachate to the sewer system, and Step 2, increase in the leachate discharge rate. The monitoring system should be in place until the conclusion of Step 2 when a maximum discharge rate is established that does not exceed unacceptable health or odor thresholds to residential receptors.

Should you have any questions, please contact me at 212 637-4410 or John Osolin at (212) 637-4412.

Sincerely,

Rich Puvogel, Chief Central New Jersey Remediation Section Superfund & Emergency Management Division US Environmental Protection Agency, Region 2

cc: J. Osolin, EPA

P. Seppi, EPA

G. Zervas, NJDEP

J. Stroin, Monroe Township

M. Rasimowicz, Center State Engineering